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**HUESTON HENNIGAN LLP**

May 2, 2025

**VIA ECF & FACSIMILE**

Hon. Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1050  
New York, New York 10007

Re: *UMG Recordings, Inc. et al. v. Uncharted Labs, Inc., et al.*, No. 24 Civ. 04777 (AKH) (S.D.N.Y.)

Dear Judge Hellerstein:

Pursuant to Local Civil Rule 7.1(d) and Rule 1(D) of this Court's Individual Rules, the parties jointly request an extension of time for the completion of document production from May 14, 2025, to July 25, 2025. Plaintiffs previously requested an extension of this deadline as part of their request to extend the time to file an amended complaint without leave of court (Dkt. 83). As set forth below, the parties' request will not impact any other deadlines currently set in this case.

The parties have been working to meet the Court's document production deadline. In the months following the parties' last appearance before the Court, the parties have met and conferred over Zoom and over multiple email exchanges to come to agreement on discovery requests and search terms. Given the complexity of the case, the number of discovery requests at issue—to date, over fifty RFPs from each side—and the number of Plaintiffs and Asserted Works, this process has been a complex one that has required careful attention and compromise on both sides. Over the course of negotiations, however, the parties have been able to reach agreement on the majority of their disputes—including disputes that may have otherwise required Court intervention. While negotiating the scope of discovery, the parties have also made progress collecting and reviewing documents. Rolling productions have begun and continue apace.

In addition to the discovery that would be expected in any major civil litigation, the parties have also expended significant resources on the highly technical discovery necessary for this case. As detailed in Plaintiffs' March 21, 2025 letter motion (Dkt. 83), the parties spent several months negotiating the protocols that govern Plaintiffs' inspection of Udio's source code and training data. Given the technical sophistication required to coordinate the inspections and the sensitivity of the information at issue, these negotiations were complex. The parties met with Special Master Judge Francis six times over a period of four months to finalize the provisions of both protocols. The protocol governing Udio's source code—which requires a seven-day notice period before the first inspection—was entered on January 10, and Plaintiffs began their inspection on January 27. The protocol governing Udio's training data was entered on March 17, and Plaintiffs promptly started their inspection on March 20. Though Plaintiffs' inspection efforts remain ongoing, their review of Udio's training data and source code has already revealed new areas for relevant discovery.

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With the expectation that the parties will work diligently to advance the case, the parties respectfully request that the deadline for document production be extended from May 14, 2025, to July 25, 2025 to provide the parties with time to respond to discovery requests, review and produce all relevant documents, and satisfy their discovery obligations. The extension will ensure that the parties' productions are wholly complete before they move to the next stages of discovery—namely, witness depositions and expert reports—and that those efforts are not complicated by preventable disputes regarding missing or incomplete information. The parties' request will not affect any other case deadline. The parties therefore propose the following amendments to the Case Management Plan (Dkt. 57):

Discovery Activities	Current Completion Date	Amended Completion Date
Completion of Document Production	May 14, 2025	July 25, 2025
Case Management Conference	May 28, 2025, at 2:30 PM ET	July 28, 2025 <sup>1</sup>

Respectfully submitted,

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<sup>1</sup> The parties have proposed an updated Case Management Conference date based on the Court's request that the parties meet after the completion of document production to discuss depositions. See Dec. 5, 2024 Hr'g Tr. at 13:4-9. If the Court grants the present extension request, the parties are amenable to proceeding with the conference on May 28, or adjourning the conference to another date if more convenient for the Court.

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